

**AFFIDAVIT OF SPECIAL AGENT JASON J. DEFREITAS IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Jason J. DeFreitas, Special Agent with the Department of Homeland Security,

Homeland Security Investigations, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Department of Homeland Security (DHS) United States Immigration and Customs Enforcement (ICE), Homeland Security Investigations (HSI) assigned to the Boston Field Office and have been employed by HSI since 2006. I am currently assigned to the Cyber Group. Prior to my assignment to the Boston Field Office, I was assigned to the HSI Los Angeles Field Office, where I served as a member of the Intellectual Property Rights Group. In connection with my official duties, I have investigated and assisted other agents in investigating cases involving a wide variety of criminal violations including, but not limited to, fraud, intellectual property rights, cultural property theft, and child pornography. Prior to my employment with ICE HSI, I served as a United States Customs and Border Protection (CBP) officer at the Los Angeles International Airport for approximately four years. My duties included the interception and examination of individuals and merchandise for violations of United States laws.
2. I submit this affidavit in support of a criminal complaint charging Paul E. Hodson II, YOB 1976, of Acushnet, Massachusetts, with one count of distribution of child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(A), and one count of possession of child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B).
3. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. This affidavit is intended to show merely that there is probable cause to secure a criminal

complaint and does not set forth all of my knowledge about this matter. Where statements of others are set forth in this affidavit, they are set forth in substance and in part.

STATEMENT OF PROBABLE CAUSE

4. On June 12, 2019, at approximately 7:30 a.m., HSI agents, with the assistance of state and local law enforcement, executed a federal search warrant (19-MJ-7177-JCB) at the residence of Paul E. HODSON II ("HODSON"), located in Acushnet, Massachusetts for evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 2252A. The affidavit submitted in support of the application for that search warrant is attached hereto as Exhibit A.
5. HODSON was present in the home. Also present were HODSON's wife and six-year-old child.
6. HODSON was advised of and executed a written waiver of his rights pursuant to *Miranda*, and agreed to speak with agents on scene. The interview was recorded; unless otherwise indicated, all statements set forth below are summary in nature.
7. When agents asked if HODSON knew why they were there, he indicated that he did, because he had reviewed the warrant. When I asked him if it made sense, he nodded and said, "I'm fucked, right?"
8. During the interview, HODSON told agents that they would find child pornography on a laptop that was located in the basement of the home and, when asked who else used it, told them it was "just mine." HODSON provided agents with the password to the computer.
9. HODSON admitted that he had been into child pornography since some time before his son was born, that he had used peer-to-peer file sharing software for a number of years

(previously, to download music), and that eMule was the only program he used to trade child pornography.

10. During the execution of the search warrant, agents also spoke with HODSON's wife. When asked about the laptop computer, she indicated that HODSON had told her it was broken. She told agents that she never went down into the basement area of the home.
11. In the course of the execution of the warrant, agents located and seized approximately seven devices, including a Dell laptop computer, which was on top of a desk in the basement; a black Samsung phone, which HODSON identified as belonging to him; and two Maxtor hard drives, which were located near the computer in the basement.
12. Agents conducted an on-scene forensic preview of the Dell laptop. Agents determined that the computer runs a version of the Microsoft Windows operating system and found it to contain a password-protected user account labeled as "Paul's Computer." The computer bears markings indicating it was manufactured in China.
13. During the forensic preview of the Dell laptop, agents observed that eMule was installed on the computer. The version is the same as that which TFO DeMello observed in the course of the underlying investigation, as outlined in Paragraph 7 of Exhibit A.
14. During the forensic preview of the Dell laptop computer, agents also observed at least 194 files that appeared to contain child pornography. The files, a mix of pictures and videos, depicted mostly prepubescent girls engaged in sexual conduct with children and adults. The apparent child pornography was located in folders found within the file path: Paul's Computer\Documents\My Games\Age of Empires 3\Trigger. The folders were named with terms that, based on my training and experience, I know are often associated with child pornography, including "pedo," "gay pedo," "lesbian pedo," and "incest."

15. In one of those subfolders, agents located the file that TFO DeMello downloaded from a computer accessing the internet from HODSON's IP address on January 26, 2019. The file is described as follows:

- a. "PEDO-PTHC---ONLY THE BEST---2015---LOLITA COLLECTION-----NEW SERIES (204).avi" is a video that is approximately 7 minutes and 25 seconds in length. It depicts a prepubescent, nude female child who appears to be approximately eight to ten years old. In this video, the child's vagina and breasts are exposed. In the course of the video, the child is depicted rubbing her genitals, first with her fingers and later with an object.¹ This video was located at the file path referenced above, in a subfolder labeled "pedo."

16. Another picture that agents observed is described as follows:

- a. "Little Black Girls (4Yo, 7Yo&11Yo)Fucked For White Man (Look More Like Interracial Pedofamily!!).jpg" is an image that depicts a prepubescent, nude female child who appears to be approximately three to five years old, positioned on her hands and knees, being penetrated by a nude white male from behind. There are at least two other individuals in the picture, both of whom appear to be nude females, but whose ages cannot be approximated from the context of the picture.² This picture was located at the same file path referenced above, in a subfolder labeled "pics."

¹ The Court reviewed a still image from this video in authorizing the search warrant and found probable cause to believe that it depicts a minor engaged in sexually explicit conduct. See Exhibit A at ¶ 8 and page 12.

² This image is available for the Court's review.

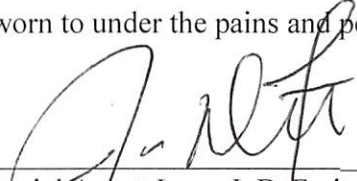
17. The computer, along with the other seized devices, were transported to the HSI forensic lab for more thorough forensic analysis.

CONCLUSION

18. Based on all of the foregoing information, I submit that there is probable cause to believe that:
 - a. on or about January 26, 2019, HODSON knowingly distributed, and attempted to distribute, any child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(2)(A); and

- b. on or about June 12, 2019, HODSON knowingly possessed material that contained one and more images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(5)(B).

Sworn to under the pains and penalties of perjury,


Special Agent Jason J. DeFreitas
Homeland Security Investigations

SUBSCRIBED and SWORN to before me on June 12, 2019.


HONORABLE JENNIFER C. BOAL
UNITED STATES MAGISTRATE JUDGE

I have reviewed the image referenced in Paragraph 16 above, and I find probable cause to believe that the image depicts a minor engaged in sexually explicit conduct. The Affiant shall preserve said image for the duration of the pendency of this matter, including any relevant appeal process.


HONORABLE JENNIFER C. BOAL
UNITED STATES MAGISTRATE JUDGE